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UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

In re:) Case No. 16-20072(JNP)
)
JOSEPH W. HAMPSHIRE) Chapter 13
)
THERESA A. HAMPSHIRE) Hearing date: 8-3-16
)
) OBJECTION TO CONFIRMATION
)

Santander Consumer USA Inc., a secured creditor of the debtors, objects to the debtors' plan for the following reasons:

- a. **Plan silent:** Santander Consumer USA Inc. holds a first purchase money security interest encumbering 2008 Ford Taurus as a result of a retail installment contract executed by the debtor in connection with the purchase of the vehicle. The plan is silent as to Santander and should be amended to state that SANTANDER CONSUMER USA INC. is unaffected by the plan, will retain its lien on the vehicle after confirmation, and if the plan completes and the debtors receive a discharge before the retail installment contract with SANTANDER CONSUMER USA INC. is paid in full according to its terms, the debtor's

obligations under the retail installment contract will not be discharged.

b. **Proof of insurance:** SANTANDER CONSUMER USA INC. requests that the debtor provide it with proof that the vehicle is insured as required by 11 U.S.C. 1326(a)(4).

/s/ John R. Morton, Jr.
John R. Morton, Jr., attorney for
Santander Consumer USA Inc.

Dated: 7-6-16